



Computer Intelligence² INC.

*Information Technology Management
Telecommunications Management Services
Aviation Systems*

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T.R.A. DOCKET ROOM

Georgia Office:
Corporate Headquarters
200 Galleria Parkway, NW,
Suite 1200
Atlanta, GA 30339

Washington Office:
CI² Aviation, Inc
1225 "I" Street, NW, Suite 950
Washington, DC 20005

March 3, 2005

Tennessee Regulatory Authority
Attention: Docket Manager
460 James Robertson Parkway
Nashville, TN 37243-0505

Re Docket #04-00354

Dear Sirs:

Having requested an extension to furnish additional information for CI²'s application for Certificate of Convenience and Necessity to provide facilities-based local services in Tennessee, the Company is filing the attached:

- 1 A signed certificate of service and date the notice was served on 18 ILECs in Tennessee.
2. A resume' for JoLynn Willingham, VP of Finance.
- 3 Pre-filed sworn testimony of Beverly Jackson revised to include an expanded, more detailed testimony of CI²'s financial. Answers to further attest to the technical ability to provide telecommunications in Tennessee.
4. A signed Small and Minority-Owned Telecommunications Business Participation Plan
5. Answers concerning numbering within the proposed service area
6. Answers concerning Tennessee Specific Operational Issues.

If there are further questions regarding this matter, feel free to call me at 770 425-2267.

Yours truly,

A handwritten signature in cursive script that reads 'Beverly Jackson'.
Beverly Jackson
Manager of Regulatory Affairs

5. Please provide answers to the following questions concerning numbering within your proposed service area.

A. What is your company's expected demand for NXXs per NPA within a year of approval of your application?

The company expects to request approximately 10 NXXs within its proposed service area

B. How many NXXs do you estimate that you will request from NANPA when you establish your service footprint?

The company expects to request one NXX from NANPA per NPA upon establishing its service footprint.

C. When and in what NPA do you expect to establish your service footprint?

- 470 Nashville 2nd Quarter, 2005
- 468 Memphis 3rd Quarter, 2005
- 474 Knoxville 4th Quarter, 2005
- 472 Chattanooga 1st Quarter, 2006
- 956 Johnson City 2nd Quarter, 2006

D. Will the company sequentially assign telephone numbers within NXXs? Yes

E. What measures does the company intend to take to conserve Tennessee numbering resources?

In cases where a Client utilizes mainly incoming service, the company will assign one main telephone number and terminal numbers in hunting for the remaining lines.

Maintaining SIP Protocol for voice communications will also conserve telephone numbers.

F. When ordering new NXXs for growth, what percentage fill of an existing NXX does the company use to determine when a request for new NXX will be initiated? 80%

6. Please provide answers to the following questions concerning Tennessee Specific Operational Issues.

- A. How long does the company intend to comply with TCA § 65-21-114? In its description, please explain technically how the company will not bill for countywide calls within Tennessee

The company will not bill for any telephone call made between 2 points in the same county in Tennessee, as the call will be classified as toll-free. As a facility-based carrier, the company will program its database to exclude billing for any NNX within the county.

- B. Is the company aware of the Tennessee County Wide calling database maintained by BellSouth and the procedure to enter your telephone numbers on the database?

Yes, the company is aware of Tennessee CWC and the procedure to submit its telephone numbers and TAR code for inclusion in BellSouth's statewide file.

- C. Is your company aware of the local calling areas provided by the Incumbent Local Exchange Carriers in your proposed service areas? Yes

- D. Explain the procedures that will be implemented to assure that your customers will not be billed long distance charges for calls within the metro area.

The company will utilize TAR codes in a database where typically the same metro area uses the same TAR code.

- E. Please provide the name and telephone number of an employee of your company that will be responsible to work with the TRA on resolving customer complaints.

Yakini Broadnax 1-888-657-3278

- F. Does the company intend to telemarket its services in Tennessee? If yes, is the company aware of the telemarketing statutes and regulations found in TCA §65-4-401 et seq., and Chapter 1220-4-11? Yes.

The company is aware of the regulations regarding telemarketing in Tennessee.

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY**

Application of CI², Inc. for a Certificate of Public Convenience and Necessity to Provide Competing Telecommunications Services as a Facilities-Based Local Exchange Carrier)
)
)
)

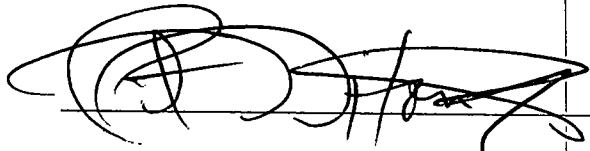
Docket No. _____

NOTICE OF FILING

To: ALL CERTIFICATED PROVIDERS OF TELECOMMUNICATIONS SERVICES IN THE STATE OF TENNESSEE

In accordance with the Rules of Tennessee Public Service Commission Division of Local Telecommunications Providers, you are hereby given notice that CI², Inc., a Georgia Corporation, has filed with the Tennessee Regulatory Authority an Application for a Certificate of Public Convenience and Necessity to provide all forms of local exchange and intrastate long distance telecommunications services within the State of Tennessee. Unless otherwise allowed by the Commission, petitions to intervene must be filed on or after twenty (20) days from the date a proposed intervenor first receives actual or constructive notice of this proceeding.

This the 13th day of October, 2004.



Pat D. Dixon, Jr., General Counsel
for CI², Inc.

Beverly Jackson
Manager of Regulatory Affairs
200 Galleria Parkway
Suite 1200
Atlanta, Georgia 30339
Phone: 770 425-2267
Fax: 678 385-1984

Jolynne Willingham

PROFESSIONAL EXPERIENCE SUMMARY:

- | | |
|-----------------------|--|
| 2000 - Present | CI², Inc., Atlanta, Georgia, Controller <ul style="list-style-type: none">• Direct all financial and accounting functions administer the organization's overall financial plans and policies• Prepare the financial reports that summarize and forecast the organization's financial position, such as income statement, balance sheet, and analysis of earnings or expenses.• Provide executive management with financial data needed for current and long-range planning, alerts it to tax issues and control and accounting problems related to new projects• Interpret financial data internal and external and working with outside auditor. |
| 1998 – 2000 | Norman H. Ross, CPA, P.C., Audit Manager <ul style="list-style-type: none">• Managed and Trained audit personnel for small accounting firm.• Prepared and reviewed published audits and compilations for Not for Profit, Profit clients ensuring GAAP and F ASB standards are followed.• Prepared and reviewed corporate and individual tax returns.• Analyzed and resolved issues with write up clients.• Developed and implemented accounting manual including accounts payable policies and procedures, purchase requisition policies and procedures, and various statistical reports for clients. |
| 1985 – 1994 | Amdahl Corporation, Manager Financial Analysis <ul style="list-style-type: none">• Managed and trained financial analysis personnel.• Prepared and reviewed Annual budget and Revenue projections-for the Regional Office• Analyzed and monitored expenditures versus budget reported to General Manager, and District Mangers monthly.• Maintained commission compensation model and prepared Commission request for sales force. |
| 1978 – 1985 | State of Georgia, Audit Supervisor <ul style="list-style-type: none">• Supervised and planned audits of agencies within the Department of Human Resources for the State of Georgia• Trained audit personnel to conduct financial and operational audits.• Prepared and reviewed financial and operational audits. |

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

**APPLICATION OF CI², INC.
FOR A CERTIFICATE TO PROVIDE
COMPETING LOCAL TELECOMMUNICATIONS
SERVICES**

PRE-FILED TESTIMONY OF BEVERLY JACKSON

I, Beverly Jackson, do hereby testify as follows in support of the application of CI², Inc (CLEC1) for a Certificate of convenience and necessity as a competing telecommunications services provider to provide telecommunications services throughout the State of Tennessee.

Q: PLEASE STATE YOUR FULL NAME, BUSINESS ADDRESS AND POSITION.

A My name is Beverly Jackson and my business address is 200 Galleria Parkway, Suite 1200, Atlanta, Georgia 30339. I am the Manager of Regulatory Affairs.

Q: PLEASE BRIEFLY DESCRIBE YOUR DUTIES.

A. As Manager of Regulatory Affairs, my responsibilities include oversight of all areas of regulatory compliance including the application for license to provide basic local exchange service in Tennessee.

Q: PLEASE DESCRIBE YOUR BUSINESS EXPERIENCE AND EDUCATIONAL BACKGROUND.

A: Before joining CI², I had retired from BellSouth Telecommunications, Inc. Of my 26 years at BellSouth, I spent 17 years as a Service Representative, specializing in order-taking from the marketing department for large customers ordering complex services which included ESSX services, analog and digital data private line services, and WATS/800 services. I also was a service representative in the D.E.C.C.O. business office which handled service orders and billing for the

United States Department of Defense and the Federal Aviation Administration from which I was promoted to Assistant Staff Manager in Training. As Assistant Staff Manager of Instructional Design, my responsibilities included training service representatives working in the major account centers where government and other large customers' requests were handled. I assisted in the development of courses including, but not limited to, WATS/800 service, local private line service, analog and digital data services, foreign exchange service, and off-premises extensions for the nine-state BellSouth region

I attended Spelman College pursuing a degree in Mathematics, and Georgia State University in Business Administration.

Q: ARE ALL STATEMENTS IN CI², INC. TRUE AND CORRECT TO THE BEST OF YOUR KNOWLEDGE, INFORMATION AND BELIEF?

A: Yes

Q: PLEASE DESCRIBE THE CURRENT STRUCTURE OF CI². INC.

A: See Attachment

Q: DOES CI², INC. POSSESS THE REQUISITE MANAGERIAL, FINANCIAL, AND TECHNICAL ABILITIES TO PROVIDE THE SERVICES FOR WHICH IT HAS APPLIED FOR AUTHORITY?

A: Yes

Q: PLEASE DESCRIBE CI², INC.'S FINANCIAL QUALIFICATIONS.

A. CI² has sufficient financial capability to provide the requested telecommunications services in Tennessee, the financial capability to maintain these services, and the financial capability to meet its lease and ownership obligations. CI² has the financial wherewithal to provide the telephone services in the State of Tennessee.
CI² presently enjoys a line of credit with the Bank of America in an amount up to \$700,000.00. In addition, the company has access to additional lines of credit

with such financial institutions as Commerce Funding in an amount up to \$6 million. The financial documents provided shows that the company is viable and anticipates continued viability. The fiscal year ending 2004 shows revenues of \$5,816,599.52, and the forecasted financials for 2005 show an increase in revenues of \$27,293,405.00.

Q: PLEASE DESCRIBE CI²'S MANAGERIAL AND TECHNICAL QUALIFICATIONS.

A. CI², Inc. has assembled an outstanding team of managers and support staff. The CLEC Team is led by Winston Johnson, CTO, whose wide range of expertise and accomplishments can be found on his resume' and website, www.winsonic.com. The Billing Department includes three (3) retired BellSouth Service Representatives who bring 90 years of billing experience. The Ordering Department includes a former service rep from BellSouth Interconnection Local Customer Service Center (LCSC), a former provisioner from Cox Communications (a CLEC), and a former MCI provisioner. Nortel and Cisco certified engineers are an integral part of the team.

Q: WHAT SERVICES WILL CI², INC. OFFER?

A. The Company will offer basic local and toll telecommunications services on a resale and/or facilities-based basis.

Q: WILL CI², INC. OFFER SERVICES TO ALL CUSTOMERS WITHIN ITS SERVICE AREA?

A: Yes. The Company will serve any customer upon request, subject to the provision of its end user tariff.

Q: DOES CI², INC. PLAN TO OFFER LOCAL EXCHANGE TELECOMMUNICATIONS IN AREAS SERVED BY ANY INCUMBENT LOCAL EXCHANGE TELEPHONE COMPANY WITH FEWER THAN 100,000 TOTAL ACCESS LINES?

A. The Company will offer services in all areas of Tennessee, except to any customers located in rural incumbent LEC's service areas for which rights are reserved according to Section 251(b) of the Telecommunications Act of 1996.

Q: WILL THE GRANTING OF A CERTIFICATE OF CONVENIENCE AND NECESSITY TO CI², INC. SERVE THE PUBLIC INTEREST?

A CI², Inc.'s application seeking entry into the Tennessee local exchange market is in the public interest because it will provide Tennessee consumers with an enhanced range of telecommunications services, will increase customer choice, will encourage carriers to provide more efficient and personalized service at lower prices, will provide users with greater reliability, and will create competitive pressure on carriers to provide more responsive customer service. CI² respectfully submits its entry will bolster competition for the provision of local telecommunications services, which is essential to the state's economic health and well-being.

Q: DOES CI², INC. INTEND TO COMPLY WITH ALL TRA RULES, STATUTES, AND ORDERS PERTAINING TO THE PROVISION OF TELECOMMUNICATIONS SERVICES IN TENNESSEE, INCLUDING THOSE FOR DISCONNECTION AND RECONNECTION OF SERVICE?

A Yes

Q: HAS ANY STATE EVER DENIED CI², INC. OR ONE OF ITS AFFILIATES AUTHORIZATION TO PROVIDE INTRASTATE SERVICE?

A. No

Q: HAS ANY STATE EVER REVOKED THE CERTIFICATION OF CI², INC. OR ONE OF ITS AFFILIATES?

A. No

Q: HAS CP², INC. OR ANY OF ITS AFFILIATED EVER BEEN INVESTIGATED OR SANCTIONED BY ANY REGULATORY FOR SERVICE OR BILLING IRREGULARITIES?

A No

Q: WHO IS KNOWLEDGEABLE ABOUT CP², INC.'S OPERATION AND WILL SERVE AS CP²'S OPERATIONS AND WILL SERVE AS CP²'S REGULATORY AND CUSTOMER SERVICE CONTACT?

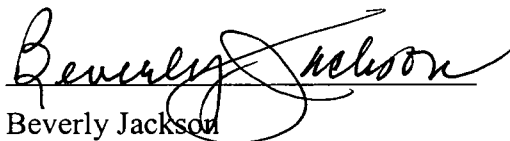
A. Beverly Jackson
200 Galleria Pkwy, Suite 1200
Atlanta, Georgia 30339
770-425-2267 X 239

Q: PLEASE EXPLAIN IN DETAIL CP², INC.'S PROPOSED PROCEDURES FOR RESPONDING TO INFORMATION REQUESTS FROM THE TRA AND ITS STAFF.

A. Information received from the TRA, whether in writing, orally or electronically, will be answered no later than close of business on the following day, if it cannot be handled immediately.

Q: DOES THIS CONCLUDE YOUR TESTIMONY?

I swear that the foregoing testimony is true and correct to the best of my knowledge.


Beverly Jackson

Manager of Regulatory Affairs

CP², Inc.

Subscribed and sworn to me on this 7th day of March, ~~2004~~ ²⁰⁰⁵.

Notary Public Iselcia A. Ruffin

State of Georgia

County of Cobb

My commission expires 5-24-07